

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NEW YORK

---

UNITED STATES OF AMERICA,

v.

17-CR-00190-RJA

G. STEVEN PIGEON,

Defendant.

---

**NOTICE OF MOTION AND MOTION TO FILE UNDER SEAL**

PLEASE TAKE NOTICE that the United States of America, through the undersigned attorneys, hereby moves this Court for an Order sealing the Government's Sentencing Memorandum, submitted separately under seal, on the grounds that it references confidential matters, as set forth more fully in the Government's Sentencing Memorandum.

DATED: Buffalo, New York, July 20, 2022.

Respectfully submitted,

COREY R. AMUNDSON  
Chief

s/JOHN D. KELLER  
Principal Deputy Chief  
United States Department of Justice  
Public Integrity Section  
1301 New York Ave. NW  
Washington, DC 20005  
[John.Keller2@usdoj.gov](mailto:John.Keller2@usdoj.gov)

TRINI E. ROSS  
United States Attorney

s/PAUL E. BONANNO  
Assistant United States Attorney  
United States Attorney's Office  
Western District of New York  
138 Delaware Avenue  
Buffalo, NY 14202  
[Paul.Bonanno@usdoj.gov](mailto:Paul.Bonanno@usdoj.gov)